

ANSWER: Defendant is not a publicly traded company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

ANSWER: Defendant asserts the appropriate division is the Charleston division because a substantial part of the events giving rise to the claims asserted in the lawsuit occurred in Charleston County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Defendant is not aware of any related matters.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: The caption of Plaintiff's Complaint incorrectly identifies TIAA-CREF Individual & Institutional Services, LLC as the defendant. As TIAA-CREF Individual & Institutional Services, LLC did not employ Plaintiff, it is not a proper party to this lawsuit. Defendant Teachers Insurance and Annuity Association of America is the only entity which employed Plaintiff. Defendant Teachers Insurance and Annuity Association of America denies that it bears any liability to Plaintiff. At this time, Defendant Teachers Insurance and Annuity Association of America does not contend that some other person or legal entity is liable in whole or in part to Defendant Teachers Insurance and Annuity Association of America or Plaintiff.

Respectfully submitted,

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